

## **REMARKS**

Claims 39-45 are pending. Reconsideration of the rejection is respectfully requested in view of the remarks.

The drawings have been objected to under 37 CFR 1.83(a) as failing to show every feature of the invention specified in the claims.

Claims 1-38 have been cancelled. With respect to the methods of Claims 39-40, 37 CFR 1.83(a) applies only to any structural detail that is essential for a proper understanding of the disclosed invention. Therefore, method claims need not be supported by the drawings.

Claims 6, 26, 29, 31, and 39 have been objected to for various informalities.

Claim 39 has been objected to, wherein the Examiner suggested that the word “for” be deleted from line 1. Claim 39 has been amended accordingly.

Claims 6, 26, 29, and 31 have been cancelled.

The Examiner’s reconsideration of the objection is respectfully requested.

Claims 1-26 and 31-39 have been rejected under 35 U.S.C. 101, as being directed to non-statutory subject matter, and further as failing to be directed towards a useful, concrete and tangible results.

Claim 39 has been amended to include “computer-implemented”, and therefore is believed to be directed to statutory subject matter.

Further, Claim 39 claims, *inter alia*, “applying a query language based on logic formalism for content retrieval .... and specifying spatial and temporal relationships pertaining to said plurality of multimedia XML documents to support XML document retrieval and modification of said multimedia XML documents.” “Supporting XML document retrieval and

modification of multimedia XML documents” is believed to be a useful, concrete and tangible result under 35 U.S.C. 101.

Claims 1-26 and 31-38 have been cancelled.

The Examiner’s reconsideration of the objection is respectfully requested.

Claims 1-40 have been rejected under 35 U.S.C. 102(b) as being anticipated by Liu et al. (“Queries of Digital Content Descriptions in MPEG-7 and MPEG-21 XML Documents,” pages 1-13, XML Europe 2002, May 22, 2002). The Examiner stated essentially that Liu teaches all the limitations of Claims 1-40. Claims 1-38 have been cancelled.

Claim 39 claims, *inter alia*, “applying a query language based on logic formalism for content retrieval, said logic formalism including element predicates and path predicates for asserting logical truth statements about said plurality of multimedia XML documents represented in said document tree,”... “wherein the path predicates are expressed as  $P(x1, x2, \dots, xn, c1, c2, \dots, cm, t1, t2, \dots, tp, a1, \dots, aq, d1, \dots, dr)$  where  $x1, x2, \dots, xn, c1, c2, \dots, cm, t1, t2, tp, a1, \dots, aq, d1, \dots, dr$  are logic variables for representing element attributes, element contents, tag names, element addresses, and element datatype members, respectively.”

Liu describes general problems in querying ISO standard MPEG-7 and MPEG-21 documents. Liu does not teach an expression of a path predicate “as  $P(x1, x2, \dots, xn, c1, c2, \dots, cm, t1, t2, \dots, tp, a1, \dots, aq, d1, \dots, dr)$  where  $x1, x2, \dots, xn, c1, c2, \dots, cm, t1, t2, tp, a1, \dots, aq, d1, \dots, dr$  are logic variables for representing element attributes, element contents, tag names, element addresses, and element datatype members, respectively”, as claimed in Claim 39. Liu gives an example of a path predicate beginning on page 9. However, Liu’s example does not teach the claimed expression for a path predicate. Therefore, Liu fails to teach all the limitations of Claim 39.

Claims 40-45 depends from Claim 39. Claims 40-45 are believed to be allowable for at least the reasons given for Claim 39. Reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 39-45, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

By: Donald B. Paschburg  
Donald B. Paschburg  
Reg. No. 33,753  
Attorney for Applicants

**SIEMENS CORPORATION**  
Intellectual Property Department  
5<sup>th</sup> Floor  
170 Wood Avenue South  
Iselin, New Jersey 08830  
(732) 321-3191  
(732) 321-3030 (FAX)